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• Campaign Against Factory Farming •

October 21, 1999

Dockets and Management Branch  
Food and Drug Administration  
5630 Fishers Ln., Rm 1061  
Rockville, MD 20852

Re: Docket Numbers 98N-1230; 96P-0418; 97P-0197

To Whom It May Concern,

The Humane Farming Association, on behalf of our more than 130,000 members, requests that the Food and Drug Administration ban farm practices that compromise the welfare of poultry and threaten human health, specifically the practice of forced molting.

Forced molting has been shown to promote the development and spread of *Salmonella enteritidis* (SE) in birds and their eggs. The stress caused by the withholding food and water to induce molting reportedly weakens the hens' immune system, making them more susceptible to SE and other zoonotic diseases. USDA immunologist Peter S. Holt has documented the fact that "...unmolted hens usually have to ingest about 50,000 *Salmonella* cells to become infected, molted hens need fewer than 10."

It is the inherent cruelty in depriving these birds of food and water that makes them so disturbingly susceptible to contracting and spreading SE. At a time when the citizens of this country are becoming increasingly aware of and sensitive to the connection between quality of life for farm animals and the factory farming contribution to the spread of life-threatening food-borne diseases, it is incumbent upon the FDA to uphold its obligation to protect the public health, safety and sensibilities. Given the mounting evidence linking forced molting to the spread of SE, banning the cruel practice is not only reasonable; failing to do so borders on criminal negligence.

Respectfully,

Pat Miller  
Community Services Coordinator

CROSS FILE SHEET

File Number:

98N-1230/ C 761

See File Number:

97P-0197/ C 762

96P-0418/ C 761



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